

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

JASON C. FRITTON, MAREA GIBSON,
BRIAN W. MOTZENBEEKER, DAWN
DUFF, and CHRISTOPHER
SHEARMAN, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

TAYLOR CORPORATION, the BOARD
OF DIRECTORS OF TAYLOR
CORPORATION, the FIDUCIARY
INVESTMENT COMMITTEE, and JOHN
DOES 1-30,

Defendants.

Civil Action No. 22-cv-00415

Judge Jeffrey M. Bryan
Mag. Judge Tony N. Leung

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT, PRELIMINARY CERTIFICATION OF
SETTLEMENT CLASS, APPROVAL OF CLASS NOTICE,
AND SCHEDULING OF A FAIRNESS HEARING**

Plaintiffs Jason C. Fritton, Marea Gibson, Brian W. Motzenbecker, Dawn Duff, and Christopher Shearman (collectively, "Plaintiffs"), participants in the Taylor Corporation 401(k) Plan (the "Plan"), respectfully submit this Unopposed¹ Motion for Preliminary Approval of the proposed Settlement documented in the Stipulation of Settlement ("Settlement" or "Stipulation")², preliminarily certifying the Settlement Class, appointing

¹ Defendants do not oppose this Motion solely for purposes of facilitating the Settlement.

² The Stipulation is attached as Exhibit 1 to the Declaration of Eric Lechtzin in support of Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement ("Lechtzin Decl."). Undefined capitalized terms herein have the same meaning as in the Stipulation.

Plaintiffs' Counsel as Class Counsel, approving the manner of notifying the Class, preliminarily approving the Plan of Allocation and Scheduling a Fairness Hearing ("Motion for Preliminary Approval") and respectfully move this Court for an Order granting the relief sought.

The grounds for this motion are set forth in all the files, records, and proceedings herein including Plaintiffs' Counsel's declarations, Memorandum of Law in support of this Motion, and supporting documents. A Proposed Order is submitted herewith.

Dated: April 5, 2024

Respectfully submitted,

/s/ Daniel C. Hedlund

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